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40059-0007

10/686,111

OCT 27 2005

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In the Patent Application of

Lanny R. Smith

Application No. 10/686,111

Filed: October 14, 2003

For: Universal Shift Apparatus and Method
For Swimming Pool Cover Assembly

Group Art Unit: 3654

Examiner: KIM, Sang K

SECOND RESPONSE AFTER FINAL

MS - AF
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Sir:

This is a full and timely response to the final Office Action mailed July 27, 2005
(hereinafter "the Office Action") and the Advisory Action mailed October 20, 2005
(hereinafter "the Advisory Action"). Reconsideration in view of the following amendments
and remarks is respectfully requested.